

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029



Mr. Harry Barrel Longswamp Township Engineer Hanover Engineering Associates Inc. 270 West Philadelphia Av. Oley, Pa. 19547 Bruce Rundell (3HS41) US EPA 1650 Arch Street Philadelphia, Pa 19103-2029 February 11, 2002

Dear Mr. Barrel,

This letter is to inform you and the Longswamp Township Supervisors of the Environmental Protection Agency's intent to modify the ground water treatment system at the Berks Sand Pit NPL Site. Currently contaminated ground water is pumped from the ground and treated by running the water through an air stripper. This removes contamination from the ground water and transfers it to the air. The air stream is then run through a activated carbon air filter. This removes the contaminants from the air.

Operation of the carbon filters requires the air to be heated to remove the humidity from the air stream before entering the carbon filters. The air is heated by an oil furnace that runs continuously. EPA is considering removing the carbon units from the treatment system and is soliciting the Townships input into the decision. The rational for removing the carbon filters is the very low levels of contaminations currently being treated, as well as the operation and maintenance costs of running the oil heater and it's associated exhaust.

The decision to include the carbon air filters in the treatment system was made in 1988. At that time the contaminant concentrations in the ground water were much higher than they are today. EPA began treating groundwater in 1993. By 1996 when the treatment system was finally completed contaminant levels in the influent had dropped below levels that required treatment of the discharged air. EPA and PaDEP decided, however, to leave the carbon filters on the treatment system. Since then the contaminant concentrations in the groundwater have continued to drop.

In areas where federal air quality standards are not met EPA requires the use of carbon air filters on air strippers that discharge more than 10 tons/year of volatile organic contaminants. In areas such as Longswamp Township where federal air standard are meet the state air regulations apply. The current calculated annual weight of contaminants being trapped by the carbon filters is 11 lbs/year. This is far below the level regulated by either the state of the federal government.

In addition to looking at air regulations EPA also modeled the estimated human health risk to a hypothetical resident living 10 meters from the air discharge point. The modeled risk was well within EPAs acceptable risk range.

I hope this explains EPAs rational for removing the carbon air filters from the treatment system. If you have any questions or concerns regarding this letter or the site in general please feel free to contact me by phone at (215) 814-3317, fax (215) 8114-3015, or at the above address.

Sincerely,

Since Rundell